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•REPORT•

REPORT SERIES 1988

88-11

**AMO POSITION ON
CONTROLLING INDUSTRIAL
DISCHARGES TO SEWERS**

THE ASSOCIATION OF MUNICIPALITIES OF ONTARIO
DECEMBER, 1988

ASSOCIATION OF MUNICIPALITIES OF ONTARIO

The Association of Municipalities of Ontario, non-partisan voluntary organization, is united to promote the values of the municipal government system and the status of the municipal level of government as a vital and essential component of the total inter-governmental framework of Ontario and Canada.

The Association acts as the collective voice of Ontario's municipal governments and is organized to accomplish through cooperation and coordination, what the majority have neither the time nor the resources to do individually.

The Association represents some seven hundred (700) municipal governments throughout Ontario. The governing body is composed of some eighty (80) municipal elected and appointed officials, who in turn represent a wide-range of municipal government interests.

The following sections and affiliated municipal professional associations form an important part of the association's structure and therefore, play an important part in its activities in terms of the Board of Directors, program and policy development:

Association Sections

- * County and Regional Section
- * Large Urban Section
- * Northern Ontario Section (FONOM/NOMA)
- * Rural Section (ROMA)
- * Organization of Small Urban Municipalities (OSUM)

Association Affiliates:

- * Association of Municipal Clerks and Treasurers of Ontario
- * Association of Municipal Tax Collectors of Ontario
- * Municipal Engineers Association
- * Ontario Municipal Administrators Association
- * Ontario Municipal Personnel Association
- * Ontario Municipal Social Services Association
- * Society of Directors of Municipal Recreation of Ontario
- * Urban Finance Officers Association of Ontario

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The Association forwarded this document in December 1988 to the Honourable James Bradley, Minister of the Environment, the Honourable John Eakins, Minister of Municipal Affairs and the Honourable Robert Nixon, Treasurer of Ontario.



EXECUTIVE SUMMARY

The Association of Municipalities of Ontario has reviewed the Ministry of Environment's green paper entitled "Controlling Industrial Discharges to Sewers" which was released for public comment in September, 1988.

AMO is concerned with the underlying philosophy of the Ministry's proposed sewer use control program with regard to enforcement.

The Association recommends:

That the responsibility for ensuring compliance of the provincial sewer use control program should rest with the provincial government but that municipalities be provided with the option to opt into the program; and

That the costs for implementation for sustaining the enforcement program, since it is a provincial initiative, be borne in its entirety by the provincial government and the affected industries; and

That the Ministry expand the public consultation process for the sewer use control program to include municipal and industrial associations. This consultation should take the form of dialogue among these groups, the Ministry of the Environment, and the public.



AMO POSITION ON CONTROLLING INDUSTRIAL DISCHARGES TO SEWERS

INTRODUCTION

In the White Paper which announced the MISA program (1986), the Ministry of the Environment (MOE) stated that the 12,000 industries which discharge waste water into some 400 municipal sewer systems may be required to pretreat their wastes. Pretreatment would require industrial production process changes or the installation of pollution control equipment to remove contaminants from waste waters before they are discharged to the sewer system.

In the response to the 1986 White Paper AMO expressed concern about the responsibility for indirect discharge industries as it is not economically feasible for municipalities to monitor indirect discharges.

The Association also expressed concern that municipal treatment plants are not designed to treat industrial wastes.

For these reasons the Association recommended that "since many of the pollutants which enter a municipal sewage treatment plant are from an industrial source - all industries, including those that discharge into municipal systems be required to monitor their own discharges and pre-treat wastes at source.

AMO's comments on the white paper as well as other comments received by the Ministry advised the province to adopt a long-term goal of virtually eliminating toxic discharge to sewers because sewage treatment plants are not designed to treat these contaminants and because most municipalities are incapable of enforcing even a minimal list of priority pollutants through existing by-laws.

In its response to these comments, the Ministry adopted a staged approach to developing a sewer use control program that would reduce toxic contaminants discharged to the sewer system. The alternatives to sewer use control would be explored and the best program would be chosen.

In determining the best sewer use control program the Ministry of the Environment reviewed a range of alternatives and viewpoints.

1. M.M. Dillon

The consulting firm of M.M. Dillon was hired to conduct a review of sewer use control programs in sixteen jurisdictions around the world. The extensive analysis identified the sewer use control program now in place in the United States as the most suitable option for consideration in Ontario. The Ministry of Environment concurred with the consultant's findings and have based their preferred option for sewer use control on the U.S. model.

2. Canadian Institute for Environmental Law and Policy (CIELAP)

An independent report of CIELAP on the sewer use control program was considered. CIELAP stated that industries which discharge into sewers should be controlled at the source. The major difference between CIELAP's recommendations and those of M.M. Dillon and the Ministry of Environment is that CIELAP believes that the provincial government, not the municipal government should enforce the industrial sewer use control program.

3. Interviews

The MOE staff visited municipalities in the United States, the United States Environmental Protection Agency Offices and environmental regulatory authorities in the Great Lake states and Canada.

4. Public Submissions

The Ministry reviewed submissions from the public, other provincial ministries, the federal government, municipal governments and industrial associations. From this review, the Ministry of the Environment developed a "green paper", Controlling Industrial Discharges to Sewers which details the Ministry's preferred option for sewer use control. Interested parties have been requested to provide comments on this preferred option within 90 days of its September 15, 1988 release.

The following text provides the Association's positions on some fundamental principles of the green paper.

These positions were developed through: an analysis of the Ministry's green paper; comments of an AMO working committee comprised of municipal representatives, representatives from the Municipal Engineers Association (MEA), the Ontario Municipal Administrators Association (OMAA); resource assistance from the Ministry of the Environment and the Ministry of Municipal Affairs; the analysis of the Canadian Institute for Environmental Law and Policy (CIELAP) paper Control at Source-Regulating Industrial Sewer-Use in Ontario; and, discussions from a one day seminar sponsored by CIELAP on sewer use control.

REVIEW OF THE MINISTRY OF THE ENVIRONMENT'S PREFERRED OPTION ON CONTROLLING INDUSTRIAL DISCHARGES TO SEWERS

The Ministry of the Environment has formulated five principles which constitute the foundation of the proposed MISA sewer use control program.

1. Control indirect discharges (industry) at the source
2. Set provincial discharge industry limits for industrial sectors at levels that can be attained using the best available technology which is economically achievable (BATEA)
3. Apply more stringent discharge limits on a site specific basis where necessary
4. Require municipalities to act as the first line of enforcement for the sewer use control program
5. Involve the public in both program development and implementation

The Association provides comments on three of these principles. While detailed examination of each principle was considered, AMO is more concerned with the underlying philosophy of three of these principles. The Association has therefore devoted its attention to the fundamentals of the proposed program rather than the specifics of the program. Namely, AMO is concerned with the enforcement of the proposed program and how the Ministry of the Environment arrived at its decision with regard to enforcement.

1. Control Indirect Dischargers at the Source

Control at source involves a number of measures to reduce the discharge of contaminants. These include manufacturing process changes, substitution of raw materials, recycling of waste by-products and treatment prior to discharging to the sewer system.

Industrial effluent contains much of the metal and organic toxic compounds found in sewage. With these toxins present in their effluents, industrial discharges pose several problems for the environment and the effective operation of the sewage treatment plant.

In the green paper, the Ministry of the Environment lists several reasons why industrial discharges should be controlled at source. These reasons are identified below.

a) Pass-Through of Toxic Pollutants

Because sewage treatment facilities are not designed to remove toxic pollutants, many of these contaminants pass untreated into waterways.

b) Interference with Sewage Treatment Plant Operation

Toxic contaminants discharged to sewers can interfere with the normal cleansing operation of sewage treatment plants. Conventional pollutants such as biodegradable wastes and suspended solids can also upset the operation of the sewage treatment plant.

c) Overflows and By-Passes

Some areas have combined storm and sanitary sewers. During periods of heavy rainfall or snowmelt, waste water and storm water may exceed the capacity of the sewer system and either overflow or are by-passed untreated into rivers and lakes.

d) Sludge Contamination

Some of the toxic compounds that are removed during treatment remain in municipal waste water sludge. Toxic-contaminated sludge disposed in landfill may pollute adjacent ground and surface water. Incineration of contaminated sludge may release toxic pollutants to the atmosphere.

e) Corrosion, Explosion and Fire

Highly acidic or caustic industrial wastes can corrode piping and equipment. Some industrial wastes contain volatile compounds and fuels which may explode or burn in the sewage treatment system.

f) Worker Hazards

Industrial wastes discharged to sewers can also result in the release of poisonous gases posing a threat to the health of sewage treatment plant workers.

g) Industry

Treatment at source would be conducted by industry personnel. These individuals should have the experience and training required to handle the toxic compounds created at the site.

AMO Response

The Association agrees with the Ministry of the Environment's proposal that industrial discharges to sewers should be controlled at the source.

The Association is concerned however with the economic impact that the Ministry's sewer use control program will have on Ontario industries and believes that the Province should try to negotiate the implementation of similar regulations in bordering areas. The economic disadvantage which will face Ontario's industries must be costed especially in light of new free trade agreements with the United States.

2. Require municipalities to act as the first line of enforcement for the sewer use control program

Under the proposed MOE program, municipalities will be required to provide the first line of enforcement for all discharge limits and other control measures. To do this, municipalities must develop an enforcement plan and submit it to the MOE for approval.

These enforcement plans will incorporate all provincial and local discharge limits and require municipalities to conduct monitoring, auditing and other enforcement activities as specified by the regulations. In cases where municipalities lack the expertise or resources, the Ministry will take over the enforcement role with direct charge back to the municipality.

Before the Ministry will approve an enforcement plan, the municipality must demonstrate it has the organization, staffing and resources to enforce all provincial and local discharge limits and other control requirements. The Ministry of Environment will provide guidelines for municipalities to assist them with the development of enforcement plans. Municipalities must also have a financial program to recover the cost of enforcement from industries.

In any situation where an industry is out of compliance, the MOE can prosecute the industry for non-compliance and the municipality for failure of enforcement.

The Ministry of the Environment bases its position to require municipalities to act as the first line of enforcement on the United States, Environmental Protection Agency's (EPA) decision to delegate authority for ensuring compliance with pretreatment programs, to the local level. The EPA believes that:

The municipal officials are familiar with their industrial users. They usually know the location, waste water flow, and pollutant loadings of the industries they serve. In many instances they have developed administrative mechanisms and client relationships which could serve as the basis for enforcement activities.

The municipal officials have knowledge of the operation of their own sewage treatment systems and thus are in the best position to respond to emergencies in the treatment system.

However, the American experience has revealed a number of problems with this delegation of authority to the local level for ensuring industrial compliance.

- o The types of standards enforced and the level of enforcement effort varies from one local authority to the next. This is attributed to: the variance in political will from municipality to municipality; the U.S. practice which allows the local authority to select the means by which it will enforce federal requirements; and differing stages of development of the program at the local level.
- o Local pretreatment programs are inadequate in ensuring industrial compliance with sewer-use standards.

- o Municipal enforcement is inadequate due to: a lack of understanding about how federal pretreatment standards are to be applied; insufficiency of regulatory requirements; and lack of local commitment to enforce the program because of inadequacy of local authority and the local authorities reluctance to prosecute industries because they are trying to encourage industrial development.
- o A significant number of industries are not complying with the pretreatment program.

Ministry of Environment Response

In response to these deficiencies in the American example, the MOE has proposed several solutions to be applied in Ontario. These proposals are contained within the MOE preferred option for sewer use control in the green paper.

1. Prosecute municipalities for failure of enforcement (total legal liability).
2. Provide municipalities with educational programs and guidelines on developing their enforcement responsibilities.
3. Require that all local enforcement programs be approved by the Ministry.
4. Where a municipality can demonstrate that it does not have the resources to administer the enforcement requirements, the Ministry will enforce on behalf of the municipality (i.e. municipality opt-out). The Ministry has not specified how it will measure the municipal ability or inability to enforce provincial requirements.

Canadian Institute for Environmental Law & Policy Response

In response to the deficiencies in the American example, the Canadian Institute for Environment Law and Policy proposed an alternative solution to be applied in Ontario.

While CIELAP considered the MOE proposal, the Institute recommended that the provincial government should be responsible for ensuring compliance with sewer-use standards with a provision to delegate this responsibility to individual municipalities in some cases (i.e. municipalities to opt-in).

CIELAP believes that the provincial responsibility for ensuring industrial compliance and the municipal option to opt-in to the program has several advantages over the MOE approach.

- o Since the province would retain primary responsibility for both standard setting and ensuring compliance, the approach avoids concerns about the division of regulatory functions between two levels of governments (p. 157).
- o The approach permits the provincial government to play the leading role in all aspects of sewer-use control. This is consistent with the province's traditional, responsibility for ensuring adequate environmental protection in Ontario.

- o The approach would minimize the opportunity for inconsistent enforcement of sewer-use standards across the province. The provincial government would be able to control the content of municipal compliance efforts from the onset by setting minimum requirements for such programs.

In addition CIELAP commented on the statement made by Christine Hart, MPP and Parliamentary Assistant to the Minister of the Environment (April 1988) that:

Our (MOE's) proposal will give municipalities the authority to provide a first line of enforcement. We will back up this authority with provincial laws to prosecute polluters for discharge violations. If a municipality is unwilling to meet its enforcement responsibilities, it will also be charged.

CIELAP stated that:

This approach to municipal-provincial relations is unprecedented in Ontario. Such prosecutions would lead to confusion and uncertainty among municipalities, the public and industry as to the regulatory agency that is accountable for sewer-use control, and would put both levels of government in an untenable political position. Further, the approach would misdirect scarce resources to the resolution of complex jurisdictional and legal issues between governments. Public attention and government funds should be directed toward controlling industries discharging to sewers rather than unnecessary conflicts between two artificially separated arms of the regulatory process.

AMO Response

In the initial response to the MISA White Paper (1986), AMO stated concern about the responsibility for indirect discharge industries as it is not economically feasible for municipalities to monitor indirect dischargers.

In fact, the Ministry of the Environment and the Canadian Institute for Environmental Law and Policy in their presentations of preferred options for sewer use control each recognize that some municipalities have the financial and staff resources to enforce a sewer use control program while other municipalities lack these resources. These ideas are expressed in their respective proposals for municipalities to opt-out of the program or to opt in.

AMO is in agreement that some municipalities in Ontario may possess the financial capabilities to enforce a sewer use control program but agrees with the position of CIELAP that the primary responsibility for ensuring compliance with the province's sewer use control program should rest with the provincial government and that provisions be made to delegate this responsibility to individual municipalities in some cases.

Financial Impact

An analysis of the financial impact of the proposed sewer use control program illustrates, that for small municipalities (under 7,500), cost per capita costs will be high. (Table 1 and Table 2)

Table 1

Proposed Ministry of Environment, MISA Sewer Use Control Program**Financial Impact****Annual Operating Costs**

Municipal Population	Program Cost (\$)	Cost per Capita (\$)
7,500	81,806	10.91
40,000	180,149	4.50
90,000	327,663	3.64
400,000	1,089,821	2.72
1,000,000	1,798,067	1.80
2,000,000	3,371,445	1.69

Table 2

Capital Costs

Municipal Population	Program Cost (\$)	Cost per Capita (\$)
7,500	119,229	15.90
40,000	222,489	5.56
90,000	410,713	4.56
400,000	1,277,646	3.19
1,000,000	2,121,304	2.12
2,000,000	3,873,351	1.94

Source: Ontario, Ministry of Environment (1986 Figures)

(These figures are based on similar programs in the United States and only provide general estimates for Ontario municipalities).

These figures would be added to the current (1987) operating costs (Table 3). (1987 capital costs for sewer and water are not available.

Table 3

CURRENT MUNICIPAL OPERATING EXPENDITURES

1987 SANITARY SEWER OPERATING COSTS FOR SELECTED MUNICIPALITIES

Population Range		Estimated 1987 Population	1987 (Revenue Fund) (Expenditures)	Per capita costs
			(\$)	(\$)
7,500	Paris T	7,815	702,947	89.95
	Techumseh T	8,040	637,537	79.30
	Bradford T	9,122	806,400	88.40
40,000	Muskoka D.M.*	38,950	2,328,437	59.78
	Cornwall C.*	45,755	3,270,323	71.47
	Barrie C	48,614	2,444,666	50.29
90,000	Sault Ste Marie C	80,143	5,827,894	72.72
	Haldimand-Norfolk*	88,813	4,554,970	51.29
	Thunder Bay C	110,894	6,054,032	54.59
400,000	Halton*	273,083	19,468,545	71.29
	Durham	331,038	24,187,038	73.06
	Hamilton/	425,365	25,465,012	59.87
	Wentworth			
100,000	None in this range			
200,000,000	Metro Toronto	2,144,048	98,202,000	45.80

The asterisks (*) indicate municipalities whose expenditures reflect combined sanitary sanitary and storm sewers.

Source: Ministry of Municipal Affairs (1987 Figures)

Costs

In the green paper, the Ministry of the Environment does propose some cost sharing between the provincial and municipal governments. The MOE proposes to fund 50 percent of the costs of developing municipal enforcement programs. The remaining amount will be covered by municipalities.

The Ministry of Environment proposes to provide one-time funding of no less than 33 percent of the costs of purchasing sampling equipment and laboratory facilities.

The costs for program sampling, inspection and enforcement will however be done by Ontario municipalities. The MOE proposes that these operating costs should be funded locally under a user-pay scheme rather than from the property tax base.

The Association does believe that municipalities have a role in sewage treatment. It must be recognized however that the MISA sewer use control program is only the first program which will have a financial impact on municipalities. In 1989, the Ministry of the Environment will be releasing information on regulations for municipal sewage treatment plants. Municipalities will be responsible for all discharges into local receiving water. It is anticipated that the costs of this program will be much higher than the costs being proposed for the sewer use control program.

Regulatory Responsibility

The Association agrees with the position of the Canadian Institute for Environmental Law and Policy that if the province retains primary responsibility for both standard setting and ensuring compliance, it would avoid concerns about the division of regulatory functions between two levels of government.

With regard to the provincial plan to prosecute municipalities for failure of enforcement of the sewer use control plan, the Association again agrees with CIELAP that this approach would misdirect scarce resources to the resolution of complex jurisdictional and legal issues between governments and that public attention and government funds should be directed to controlling industries discharging to sewers rather than unnecessary conflicts between two artificially separated arms of the regulatory process.

For these reasons AMO recommends:

That the responsibility for ensuring compliance of the provincial sewer use control program should rest with the provincial government but that municipalities be provided with the option to opt into the program; and,

That the costs for implementation for sustaining the enforcement program, since it is a provincial initiative, be borne in its entirety by the provincial government and the affected industries.

PUBLIC PARTICIPATION

The Association is concerned with the current public consultation process that has been adopted for the MISA program.

AMO believes that it is beneficial to include all interested parties in discussion prior to the release of a government green paper which outlines a preferred government position.

While the green paper method of public consultation might be the easiest process logistically, the Association believes that dialogue among interested parties on the situation might assist in the exchange of potential problems, concerns, misconceptions and alternative ideas regarding solutions.

The Canadian Chemical Producers Association (CCPA) believes that:

Consultation should take the form of a dialogue among affected stakeholders. Consultation should begin in the conceptual stage when the parameters of the problem are defined and broad policy objectives are developed. In our view, meaningful consultation with industry on controlling sewer effluents or sewer use in Ontario has not yet begun.

Therefore, we have great difficulty with the MOE statement that the final position on the sewer use control program is to be completed by December, 1988.

There is ample common ground for developing a consensus about how the municipal sewage systems, as a total entity, can best be brought into line with MISA objectives. We need a mechanism to achieve that consensus and that's what the people of Ontario want. They want us to solve the problem of contaminated beaches, inedible fish and ecological damage in an effective and efficient manner".

With regard to the response time to the MOE's green paper on sewer use control, AMO believes that the government has not provided enough time for response. When insufficient time is provided, responses tend to be cursory or knee jerk reactions rather than well researched responses.

The Association recognizes the time deadlines that the MOE has established but believes that a program of this magnitude in ambition and cost needs to be well thought out or costly mistakes by both levels of government and industries will ensue.

From the municipal perspective, it has been a difficult process to respond to the Ministry's green paper as new councils were elected in November. These new councils will unlikely have the opportunity even to meet before the deadline for a response has passed.

The Association therefore recommends:

That the Ministry expand the public consultation process for the sewer use control program to include municipal and industrial associations. This consultation should take the form of dialogue among these groups, the Ministry of the Environment, and the public.

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